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NAS FORT WORTH
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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON DRAFT
BASEWIDE BACKGROUND SAMPLING AND ANALYSIS PLAN NAS FORT WORTH TX
3/22/1999
U S EPA REGION VI



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 461



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAR 25 REC'D

March 22, 1999

Ray Risner
Corrective Action Section
Remediation Division
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, TX 78711-3087

Dear Mr. Risner:

The Environmental Protection Agency (EPA) has reviewed the following document, "Draft 1999 Basewide Groundwater Sampling and Analysis Plan, Naval Air Station Fort Worth, Joint Reserve Base, Carswell Field, Texas." This document discusses sampling in areas impacted by the trichloroethene (TCE) plume from Air Force Plant 4. The plan includes groundwater monitoring on property currently leased by the local redevelopment authority through the Base Realignment and Closure process.

General Comments.

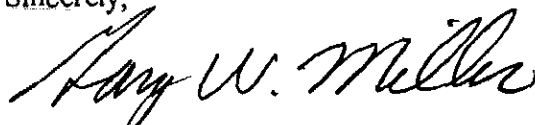
1. There is a limited number of monitoring wells screened in the Paluxy Aquifer scattered across Carswell AFB. Although there is no indication that contamination of the Paluxy Aquifer has occurred, a monitoring program for the Paluxy Aquifer should be included.
2. The plan indicates that problems identified with monitoring wells will be resolved quarterly or on an annual basis if it is significant. I assume that this requirement is included in the contractors statement of work and no additional response action will be required each time a problem is identified. In the past, numerous problems from missing locks to missing wells have been identified in quarterly monitoring reports resulting in a large backlog. Although the Air Force has indicated their plans to correct the monitoring well deficiencies, incorporating the requirement in this document should prevent future problems from going uncorrected.
3. The general format of a basewide sampling and analysis plan is a good idea. This will combine various monitoring programs into one report. However, it still appears that the Air Force (Carswell) should come to an agreement with Air Force Plant 4 (AFP 4) on monitoring the TCE plume. This plan does not incorporate all of the existing wells that should be sampled to delineate the plume. With AFP 4 sampling a few wells and Carswell

sampling other wells, it does not appear that the results will be combined into one report.

4. For all wells used in the sampling program at Carswell consideration should be given to the location of screens. Since higher concentration of TCE have been found in the lower zone of the aquifer, wells screened in the lower zone should be used. In the areas of the plume where high concentrations are present this may not make a lot of difference. However, along the edge of the plume where delineation of the plume is important, wells screened across the top of the aquifer may miss the contamination.

Please contact me at (214) 665-8306 should you wish to discuss this further.

Sincerely,



Gary W. Miller
Senior Project Manager
Base Closure Team

cc:

Mr. Mark Weegar
Mr. Rafael Vazquez
Mr. Joseph Dunkle

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